



MODERN SLAVERY STATEMENT

1. C40 Structure and Supply Chains

C40 Cities is a network of mayors committed to creating a thriving future for our communities, our cities, and the natural world around us. This is why C40's mission is to halve the emissions of its member cities by 2030, while improving equity, building resilience, and creating the conditions for everyone, everywhere to thrive. Our zero-tolerance approach to modern slavery and human trafficking forms part of this mission.

This applies to all our entities, including C40 Cities Climate Leadership Group Inc. in the U.S., C40 UK, C40 South Africa, and C40's Beijing Representative Office (collectively "C40") with the support of our leadership, including the C40 Chair, the Steering Committee, and the Board of Directors. Modern Slavery is owned as a key risk area by the Legal and Compliance team. The legal team forms part of our Corporate Services team, reporting to the Managing Director of Corporate Services.

C40 is committed to acting ethically and acting to prevent and tackle modern slavery and human trafficking throughout the organisation as well as in our supply chain and partner organisations. We use suppliers and consultants to support the cities within our network as well as the operations of our organisation in the UK and internationally. The key areas in which we engage suppliers include:

- Professional consulting and project management.
- Translation & interpretation services;
- Media, communications, and other events support;
- Travel, hospitality, food and beverage;
- IT equipment, accessories, software and consulting services;
- Human resources such as benefits, training, recruitment, and payroll services;
- Professional services such as audit, legal and tax consulting.

2. Policies Relating to Slavery and Human Trafficking

C40 is committed to the highest global standard of ethical business conduct and conducts all operations in a proper, fair, impartial, and ethical manner, and will only do business with others who share our values and standards of conduct. We have implemented measures to make sure all C40 employees and third-party representatives observe and maintain high standards of ethical conduct in their relationships with clients, suppliers, subcontractors, communities, fellow employees, beneficiaries, grantees and others, wherever they work. C40 entities and affiliates, and their employees worldwide, are committed to act in full compliance with all applicable laws and regulations in countries where C40 conducts business.

We are prepared to take action against anyone who may refuse to comply with these standards and have implemented the following policies and processes in accordance with our zero-tolerance approach to modern slavery and human trafficking:

- **Ethical Business Conduct Policy**, providing an overarching policy on Ethical Business Conduct and associated policies, including doing business with responsible entities;
- **Safeguarding and Welfare Policy** and a **Safeguarding Manual of Practice** to ensure the safety and protection of all beneficiaries;
- **Global Whistleblower Policy**, explaining the process and steps taken around whistleblowing and the safeguarding of whistleblowers;
- **Complaints Procedure**, providing guidance on how and where to deliver complaints;
- **Wellbeing and Health at Work Policy and Practice**, and a **Wellbeing Framework**, providing a results-oriented, inclusive, and comprehensive framework for an open and supportive practice for promoting staff health and wellbeing, including the goals that C40 is committed to meeting;
- **Staff Code of Conduct**, covering employee behaviour and attitude in line with C40's expectations;
- **Equity, Diversity, and Inclusion Policy**, including an **Action Plan** and a **Diversity on Panels** policy, outlining C40's commitment to embracing equity and tackling discrimination in all its forms;
- **Equal Opportunity Policy**, demonstrating how C40 aims to promote an environment that is free from all forms of unlawful or unfair discrimination, and values the diversity of all people
- **Events Code of Conduct**, prescribing behaviour in line with C40's expectations;
- **Contracting and Procurement Manual**, providing comprehensive instructions on how to carry out fair and equitable procurement of goods and services.

3. Due Diligence, Risk Assessment & Management

We adopt a risk-based approach to the organisations that we fund or suppliers that we engage. Given the nature of our work, we consider the risk of modern slavery occurring in our operations to be low. The profile of our workforce is entirely professional, office based roles and the majority of our suppliers are also professional services.

As such, C40 conducts reasonable due diligence on our professional suppliers, based on the nature of the relationship or transaction. This includes:

- Using a sanctions screening software to screen all new suppliers and organisations we partner with;
- Where appropriate, contracting with suppliers and partner organisations using our legal templates, to require them to confirm that appropriate safeguarding policies, protocols, and practices are in place, as well as that slavery and human trafficking is not taking place in their business or supply chain.

We regard the key risk of C40 operations coming into contact with modern slavery to be where we engage with the hotels and hospitality industries - for example catering services at our events. This is largely mitigated by staff assessing the venue, ideally by a site visit prior to the event, or by receiving recommendations from our city government partners.

4. Measuring Our Effectiveness & Training Our Staff

C40 continually reviews our policies and procedures to ensure that we are equipped to identify and address ethical challenges to our mission. We aim to act transparently and disclose information about any modern slavery risks we have identified, as well as the actions we take in response to them. In addition, we have established a Diversity, Inclusion, and Anti-Racism Committee and a Staff Consultation Forum to oversee C40's work on diversity, inclusion, and anti-racism.

C40 continually improves its training offering to staff on ethical conduct issues and aims to roll out a broad training programme on Ethical Business Conduct, incorporating modern slavery, over the course of 2023.

This statement was approved by C40's Operational Management Team on 12th January 2022 in compliance with Section 54(6) of the UK Modern Slavery Act 2015.

Juliette Carter

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*Managing Director of Corporate Services
C40 Cities*